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10 Attorneys for Courtney Love Cobain

11  
12 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
13 FOR KING COUNTY  
14

15 RICHARD LEE,

16 Plaintiff,

17 vs.

18 CITY OF SEATTLE, SEATTLE POLICE  
19 DEPARTMENT and SPD INTERIM CHIEF  
20 HARRY BAILEY and SPD DETECTIVE  
21 MIKE CIESYNSKI,

22 Defendants.

No.: 14-2-09292-0 SEA

DECLARATION OF COURTNEY LOVE  
COBAIN

23 COURTNEY LOVE COBAIN declares and states:

24 1. My name is Courtney Love Cobain. I have personal knowledge of the facts  
25 contained within this declaration, and am competent to testify thereto.

26 2. I am the widow of Kurt Cobain, who committed suicide in 1994. Kurt's death  
27 was the most traumatic experience of my life. It left me physically distraught, and I continue to  
28 suffer emotionally from the loss of my husband to this day.

3. I understand that the Plaintiff seeks the public release of death-scene photos of  
Kurt that show his entire lifeless body, as well as the damage done by the shotgun blast to his  
head. I have never seen these graphic and disturbing images, nor do I ever want to. I cannot

1 believe that there exists any genuine public interest which might be served by the public release  
2 of these images. Certainly, public disclosure would reopen all my old wounds, and cause me and  
3 my family permanent – indeed, endless and needless – pain and suffering, and would be a gross  
4 violation of our privacy interests.

5 4. Inevitably, these images will wind up on the Internet, where they would be  
6 permanently disseminated. By virtue of the fact that Kurt is my late husband, they will also  
7 likely end up in search results about myself. I would unavoidably come across them, and I  
8 would never be able to erase those haunting images from my mind. I cannot even imagine the  
9 enormity of the trauma this would cause me, not to mention many others.

10 5. I am routinely called a murderer and receive death threats by conspiracy-theory  
11 obsessed individuals who believe I was somehow involved in my husband's death, and the  
12 public release of these images would only exacerbate such activity and further endanger my  
13 safety.

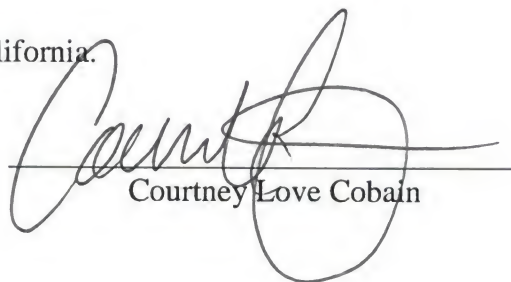
14 6. It also sickens me that if released, third parties, like the Plaintiff, will wrongfully  
15 profit from exploiting these images.

16 7. Preventing unnecessary disclosure of private information related to Kurt has been  
17 my consistent position for over twenty years. In 1995, I successfully attained injunctive relief in  
18 the matter *Courtney Love Cobain v. Washington State Patrol*, No. 95-2-27261-4 SEA,  
19 preventing the disclosure of private letters Kurt wrote to me shortly before his death.

20 8. I understand that even if this current matter is dismissed on procedural grounds,  
21 the Plaintiff might attempt yet another lawsuit. If that happens, I would again intervene like I did  
22 in the prior matter and seek injunctive relief.

23  
24 I declare under penalty of perjury under the laws of the State of Washington that the  
25 foregoing is true and correct.

26 Executed July 20, 2015, in Los Angeles, California.

27  
28   
Courtney Love Cobain